

DECLARATION OF GARRETT E. DREW

I, Garrett E. Drew, declare under penalty of perjury as follows:

1. I submit this declaration in support of the motion for detention filed by the United States in *United States v. Xavier Pelkey*, case number 1:22-mj-00022-JCN in the U.S. District Court for the District of Maine.

2. I am a Special Agent with the Federal Bureau of Investigation, and have served in that position since March 1, 2020. I am currently assigned to the FBI's Portland, Maine Resident Agency. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to international and domestic terrorism and other threats to national security and public safety.

3. Prior to joining the FBI, I was a Special Agent with the United States Secret Service from 2015 to 2020. Among other assignments, I was detailed to the FBI Joint Terrorism Task Force as an investigator in the FBI New York Field Office. From 2009 until 2015, I was employed as a police officer in Portsmouth, New Hampshire.

4. I am one of the agents assigned to the investigation of Xavier Pelkey. In that role, I have obtained information through my own investigation, and I have received information from other law enforcement personnel and from persons with knowledge regarding relevant facts.

5. On February 5, 2022, FBI agents in Chicago executed a federal search warrant at the residence of a 15-year-old male, whom I will call Juvenile #1 in this Declaration. During the investigation that led to the search warrant, FBI investigators had learned that Juvenile #1 had conspired with two other individuals, one of whom identified himself as "Abdullah," to meet him in the Chicago area and conduct a violent attack. Juvenile #1 and the other two individuals communicated online using Instagram as well as other chat applications.

6. Following the execution of the search warrant at his residence on February 5, Juvenile #1 spoke with FBI agents. He told them that he, Abdullah and the third individual had planned to attack an identified Shia Muslim mosque in the Chicago area. I know from my experience in counterterrorism investigations that adherents of Islamic extremist groups such as ISIS consider other Muslims, including the Shia sect of Islam, as non-Muslims and have historically targeted them in terrorist attacks.

7. Juvenile #1 told investigators that the plan was for Abdullah and the other individual to meet him in Chicago in late March, during “spring break.” Abdullah and the other individual would travel by bus or train to meet Juvenile #1. Abdullah’s responsibility was to acquire additional firearms and ammunition. Abdullah informed Juvenile #1 that he had built an explosive device, in order to “get more people.”

8. Juvenile #1 further explained that they would enter the Shia mosque and separate the adults from the children, then murder the adults. If they had not encountered law enforcement at that point, they would continue on to another Shia mosque or Jewish synagogue and execute the same plan. They did not have a plan to escape but rather their plan ended with them being shot by law enforcement.

9. Juvenile #1 said that when Abdullah communicated with him over Instagram, Abdullah used an Instagram account with the username “Abdullah.ibn.ahmad.”

10. Agents from Chicago FBI seized multiple firearms, including a Remington pump shotgun, swords, knives, a bow and arrows, multiple homemade ISIS flags, and multiple electronic devices from Juvenile #1’s residence.

11. On February 13, 2022, FBI agents in Kentucky executed a search warrant at the residence of a 17-year-old male, whom I will call Juvenile #2 in this Declaration. Juvenile #2

was suspected of conspiring to provide material support to a foreign terrorist organization. In an interview with FBI agents during the execution of the search warrant, Juvenile #2 stated that he had communicated online with Abdullah, who used an Instagram account with the username Abdullah.ibn.ahmad. Juvenile #2 said that Abdullah had talked about gathering materials to make fireworks to attack someone. Juvenile #2 also said that Abdullah told him that he wanted Allah to grant him to be a shaheed and die while fighting in the cause of Allah. I know from my training and experience that “shaheed” is an Arabic word that means a martyr in Islam.

12. As part of FBI’s investigation, on February 8, 2022, Facebook was served with an emergency disclosure request for the Instagram account with the username Abdullah.ibn.ahmad. Meta Inc.’s response to the request included several IP addresses used to access the account, including the following:

- 108.183.186.1;
- 2603:7081:6d02:6200:8936:5802:4edc:8d1f; and
- 2603:7081:6d02:6200:bdba:e892:537d:b563.

13. A subsequent emergency disclosure request was issued to Charter Communications, the owner of the IP addresses provided by Meta Inc. Charter disclosed that all three IP addresses resolved to an account registered to an individual at 80 Front Street Apartment 1, Waterville, ME 04901.

14. Other FBI investigators and I executed a search warrant at 80 Front Street Apartment 1 in Waterville on February 11, 2022. Xavier Pelkey was present at the apartment. He agreed to answer some questions from investigators. He confirmed that he was the owner of the Instagram account with the username Abdullah.ibn.ahmad.

15. As noted in the affidavit that my colleague Special Agent Nathan Jacobs submitted in support of the criminal complaint filed against Xavier Pelkey on February 11, FBI investigators found three homemade explosive devices in a backpack in the corner of Pelkey's bedroom.

16. On the wall of Pelkey's bedroom, investigators observed a hand-painted version of the flag used by the foreign terrorist organization ISIS. The following is a photograph of the flag, taken in the bedroom:



Investigators also found a smaller hand-painted version of the flag in the bedroom:



I declare under penalty of perjury that the foregoing is true and correct. Executed on February 20, 2022.

/s/ Garrett E. Drew
Garrett E. Drew
Special Agent
Federal Bureau of Investigation